

**United States of America v. State of
Mississippi, 3:16-cv-622**

Case ReportBook

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Department of Justice

Thursday, June 27, 2019

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**United States of America v. State of
Mississippi, 3:16-cv-622**

032218 Andrew Day (Final)

3/22/2018

Annotation Digest - All Annotations

Issue Filter: U.S. Rebuttal Designation (June)

TextMap Annotation Digest Report

Case Name: United States of America v. State of Mississippi, 3:16-cv-622

Transcript: [3/22/2018] 032218 Andrew Day (Final)

Issue Filter: U.S. Rebuttal Designation (June)

Pg: 80 Ln: 25 - Pg: 81 Ln: 5

Annotation:

80:25 Q. So you oversaw all grants for
81: 1 community-based mental health services as part of
2 your responsibility as division director of adult
3 community services?
4 A. Not all grants. Just the ones that are
5 for adult services.

Pg: 84 Ln: 17 - 21

Annotation:

84:17 Q. Okay. Who replaced you as director of
18 the division of adult community services?
19 A. Veronica Vaughn.
20 Q. I'm sorry?
21 A. Veronica Vaughn.

Pg: 117 Ln: 14 - Pg: 118 Ln: 15

Annotation:

117:14 Q. You've just been handed what's been
15 marked as Exhibit 6. Do you recognize this
16 document?
17 A. Yes.
18 Q. And what is it?
19 A. It is the monthly data report for the
20 crisis stabilization units.
21 Q. And is this the report that all CSUs
22 submit?
23 A. Yes.
24 Q. And they submit this once monthly, right?
25 A. Yes.
118: 1 Q. Typically from probably the same staff
2 member at the CSU?
3 A. I assume so.
4 Q. Yeah. So looking at this report here,
5 which is dated June 10, 2017, and it's from Grenada
6 crisis stabilization unit; is that right?
7 A. Correct.
8 Q. Looking at the report here and the
9 statistics reported what can you tell about the
10 unmet need for CSU services at Grenada crisis
11 stabilization unit?
12 A. Probably item number 13.
13 Q. Item number 13.
14 A. So maybe an unmet need, but it may not be
15 a need that CSU can offer.

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Pg: 119 Ln: 6 - 19

Annotation:

119: 6 Q. Okay. I understand. So this actually
7 doesn't really tell you whether or not there is an
8 unmet need necessarily, right?
9 A. It may and it may not.
10 Q. May or may not. Okay. And how can you
11 tell whether it does or doesn't?
12 A. Well, it would give me a general idea of
13 why individuals are being not admitted. And so that
14 may indicate it needs to be looked into further.
15 Q. So which -- are -- are there any
16 statistics here on this page under number 13 that
17 you think would need to be looked into?
18 A. Well, it would show unmet need, maybe
19 substance abuse is the primary issue.

Pg: 141 Ln: 23 - Pg: 143 Ln: 18

Annotation:

141:23 Q. Let's go back to Exhibit 4 now. And this
24 is the document that reads -- the press release,
25 titled "Mississippi Works to Improve Crisis
142: 1 Services," right?
2 A. Yes.
3 Q. And we discussed earlier the line, "It's
4 critical for people to receive treatment before they
5 become so acutely ill that hospitalization is
6 required."
7 A. Yes.
8 Q. And you previously stated you agree that
9 it is critical for them to receive this treatment,
10 correct?
11 A. Yes.
12 Q. Is it also urgent? Strike that. That's
13 fine.
14 So flipping back now to Exhibit 7. Are
15 individuals who are held in jails and holding
16 facilities for weeks before admission to CSU are
17 they getting access to critical treatment in order
18 to avoid hospitalization?
19 A. It depends on the jail and depends on the
20 situation with the individual.
21 Q. So do you think there are some jails that
22 are able to meet the need for mental health services
23 from that individual so as to prevent admission to a
24 state hospital?
25 A. I think there are jails that are able to
143: 1 provide the same level of service. Is that what
2 you're asking?
3 Q. Some level of service? I'm sorry. I
4 just didn't hear you.

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Pg: 141 Ln: 23 - Pg: 143 Ln: 18 continued...

Annotation:

143: 5 A. The same level of service?
6 Q. Same level of service.
7 A. Not as a CSU, no.
8 Q. Not as a CSU. But these -- these
9 individuals have been referred to a CSU because they
10 are in an acute mental health crisis, right?
11 A. Yes, I assume so.
12 Q. But they are not receiving the same
13 services that a CSU offers while they are waiting
14 for admission to a CSU, correct?
15 A. I would -- I would doubt any jail had the
16 same level of service as a CSU. It just depends on
17 which jail you're in and how much effort they put
18 towards treating the people they have in jail?

Pg: 166 Ln: 16 - 18

Annotation:

166:16 Q. Okay. Do you know how much CMHC are
17 billing Medicaid for mobile crisis services?
18 A. I do not.

Pg: 177 Ln: 11 - Pg: 178 Ln: 25

Annotation:

177:11 Q. So they make this representation that
12 they have access 24/7/365 through these site
13 reviews; is that correct?
14 A. Yes.
15 Q. Okay. And do you just leave it at that?
16 Is there any investigation of -- of that
17 representation?
18 A. Well, we review the -- they keep a mobile
19 crisis log and it shows who all they've contacted
20 each day and each month. And then we review client
21 records to see, you know, what happened on a -- just
22 a random sample.
23 Q. Okay. So that's part of this review is a
24 random sample --
25 A. Right.
178: 1 Q. -- of records you review?
2 Okay. The monthly reports that you get
3 regarding mobile crisis services do those include
4 any client-specific information?
5 A. No.
6 Q. Similar to the CSU monthly reports,
7 correct?
8 A. Correct.
9 Q. So you're not able through those monthly
10 reports to track individual outcomes?

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Case Name: United States of America v. State of Mississippi, 3:16-cv-622

Transcript: [3/22/2018] 032218 Andrew Day (Final)

Issue Filter: U.S. Rebuttal Designation (June)

Pg: 177 Ln: 11 - Pg: 178 Ln: 25 continued...

Annotation:

178:11 A. No.
12 Q. So if an individual was served by a
13 mobile crisis team on one day and successfully
14 diverted, deescalated, that would be reported on --
15 on the monthly re -- the monthly reports to DMH,
16 correct?
17 A. On the monthly report they would
18 basically say "We provided a service," and that
19 would count as a contact. And then they would
20 determine whether or not it was referred on to some
21 level of 24-hour service. But other than that,
22 that's not -- there's not much --
23 Q. Okay.
24 A. -- else besides that, or referred into
25 regular therapy services.

Pg: 179 Ln: 1 - 5

Annotation:

179: 1 Q. So there's no reporting as to whether
2 that individual ultimately remains in the community
3 after the mobile crisis contact, correct?
4 A. There's not any individual information on
5 those reports.

Pg: 184 Ln: 19 - 22

Annotation:

184:19 Q. Does DMH track the number of mobile
20 crisis response clients that are referred to a state
21 hospital?
22 A. I do not know.

Pg: 205 Ln: 7 - 18

Annotation:

205: 7 Q. '13. Okay. And so as far as you know
8 there's not been another assessment since then about
9 the unmet need for PACT services in Mississippi?
10 A. No, I believe there has been some. I
11 just haven't been involved in them.
12 Q. Okay. Okay. And do you know who at DMH
13 has been involved in those assessments?
14 A. I don't know specifically.
15 Q. Who's in charge of PACT services for DMH
16 right now?
17 A. It's still in the division of adult
18 services which Veronica Vaughn is over.

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Pg: 206 Ln: 8 - 15

Annotation:

206: 8 Q. Mr. Day, the regions that do not
9 currently operate a PACT program have they expressed
10 interest in starting a PACT program in their
11 regions?
12 A. I don't remember specifically, but
13 probably so. I don't know for sure.
14 (Whereupon, Exhibit No. 16 was marked for
15 identification.)

Pg: 207 Ln: 5 - 11

Annotation:

207: 5 Q. So Nikki was applying for -- submitted an
6 application on behalf of Region 4 for an additional
7 PACT team?
8 A. Correct.
9 Q. Okay. And that application was denied?
10 A. Well, they didn't get the award. So I
11 guess "denied" is a word you can use.

Pg: 251 Ln: 17 - 19

Annotation:

251:17 Q. Has DMH assessed the unmet need for
18 intensive community support services in Mississippi?
19 A. Not that I'm aware of.

Pg: 255 Ln: 18 - Pg: 256 Ln: 6

Annotation:

255:18 Q. Did you receive reports from the CMHCs
19 about community support services?
20 A. Yes.
21 Q. How often?
22 A. Monthly.
23 Q. Monthly. And did those reports provide
24 data regarding the service?
25 A. Yes.
256: 1 Q. Was that data client specific?
2 A. No.
3 Q. So it wouldn't tell you whether any
4 particular person had got or lost a job, it would
5 just list the number of jobs?
6 A. Yes.

Pg: 261 Ln: 9 - 16

Annotation:

261: 9 Q. Did you ever generate aggregate data
10 reports for support employment services the same way

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Pg: 261 Ln: 9 - 16 continued...

Annotation:

261:11 you do for CSU?

12 A. Yes.

13 Q. What did you do with the -- with that
14 data?

15 A. It was used as part of our strategic plan
16 reporting.

Pg: 277 Ln: 23 - Pg: 278 Ln: 2

Annotation:

277:23 Q. So would you say the goal of the
24 strategic plan and best practices committee is to
25 promote community integration in Mississippi for

278: 1 adults with serious mental illness?

2 A. Yes.

Pg: 290 Ln: 11 - Pg: 291 Ln: 3

Annotation:

290:11 Q. Do you think the DMH meets those needs
12 currently for adults with serious mental illness in
13 Mississippi?

14 A. I don't know if DMH meets those needs and
15 I don't know if DMH is responsible for meeting those
16 needs. They can help facilitate finding housing and
17 employment, but not necessarily providing the actual
18 service.

19 Q. Although -- so DMH does help to
20 facilitate those things?

21 A. Yes.

22 Q. That's what supportive employment is,
23 correct?

24 A. Yes.

25 Q. But those services -- supportive
291: 1 employment services are not available everywhere in
2 the state, correct?

3 A. Correct.

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Mississippi, 3:16-cv-622**

032918 Veronica Vaughn (Final)

3/29/2018

Annotation Digest - All Annotations

Issue Filter: U.S. Rebuttal Designation (June)

TextMap Annotation Digest Report

Case Name: United States of America v. State of Mississippi, 3:16-cv-622

Transcript: [3/29/2018] 032918 Veronica Vaughn (Final)

Issue Filter: U.S. Rebuttal Designation (June)

Pg: 11 Ln: 22 - Pg: 12 Ln: 4

Annotation:

11:22 And so you mentioned a couple of
23 services that you now oversee in your job.
24 What -- what do you do with respect to those
25 services?
12: 1 A. I'm just the supervisor over the
2 staff -- the -- provide technical assistance with
3 the services with all of the providers, manage all
4 of the grants.

Pg: 30 Ln: 20 - Pg: 32 Ln: 7

Annotation:

30:20 Q. Okay. Would you -- is there a set of
21 services from the ones you listed that you would
22 describe as reactive or crisis-based?
23 A. Mobile crisis.
24 Q. Are there others?
25 A. I'm not sure.
31: 1 Q. The CSUs, for instance?
2 A. The CSUs.
3 Q. Crisis intervention training?
4 A. Crisis intervention training, no. CSUs,
5 yeah.
6 Q. Why not crisis intervention training?
7 A. It's not reactive. It's just a training
8 to law enforcement so they can know how to
9 recognize somebody that's in a mental health
10 crisis.
11 Q. So it's training for other people to be
12 reactive?
13 A. Correct.
14 Q. Okay. And then there are other services
15 you mentioned like individual or group therapies
16 or PSR that are different than that. Is that
17 fair?
18 A. Are there other services different from
19 PSR?
20 Q. No. There are services like PSR.
21 A. Day services, yeah.
22 Q. Like day services or individual or group
23 therapy that is not reactive in the same way --
24 A. Correct.
25 Q. -- that crisis services are.
32: 1 Is there a term that you use to describe
2 the nonreactive services as a group?
3 A. No.
4 Q. I use the term "maintenance services"?
5 A. Okay.
6 Q. Will you understand what I mean?
7 A. Okay.

TextMap Annotation Digest Report**Case Name:** United States of America v. State of Mississippi, 3:16-cv-622**Transcript:** [3/29/2018] 032918 Veronica Vaughn (Final)**Issue Filter:** U.S. Rebuttal Designation (June)**Pg: 32 Ln: 17 - Pg: 34 Ln: 6****Annotation:**

32:17 Q. Okay. When somebody requires a crisis
 18 service, like mobile crisis or like time in a
 19 crisis stabilization unit, does the -- does DMH
 20 keep track of whether that person was receiving
 21 maintenance services prior to having the crisis?
 22 A. We wouldn't keep track of it, but the
 23 community mental health center would keep track of
 24 it.

25 Q. How would the community mental -- how
 33: 1 would the community mental health center keep
 2 track of that?
 3 A. I'm sure all 14 of them do it different,
 4 but they have to, you know, report some numbers to
 5 the CDR.

6 Q. And what's the CDR?
 7 A. Data repository, central data
 8 repository.

9 Q. And that's a database that's run by the
 10 State office?
 11 A. Yes. Or IDS.

12 Q. The Department of Mental Health?
 13 A. Yeah.

14 Q. So the CMHCs need to report data in to
 15 the CDR?
 16 A. They do, but, you know, usually when you
 17 go on a site visit or we go to monitor the
 18 providers, you will be able to tell somebody's
 19 history just in their -- in their chart. You
 20 know, going to PSR, gets case management. They
 21 went in for a five-day stay at CSU. You would be
 22 able to tell that, so we would have access to that
 23 when we do monitoring.

24 Q. That's when people from DMH State office
 25 go to a particular provider --

34: 1 A. Yes.
 2 Q. -- to confirm whether or not they are
 3 complying with --
 4 A. Yes.
 5 Q. -- various regulations?
 6 A. Yes.

Pg: 35 Ln: 11 - 21**Annotation:**

35:11 Q. But not -- if I understand your answer
 12 correctly, DMH would not be able to say out of the
 13 "X" number of people who went to a crisis
 14 stabilization unit in 2017, "Y" percent of those
 15 people had been receiving maintenance services
 16 prior to going to the CSU?

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Case Name: United States of America v. State of Mississippi, 3:16-cv-622

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Issue Filter: U.S. Rebuttal Designation (June)

Pg: 35 Ln: 11 - 21 continued...

Annotation:

35:17 A. I'm trying to think what's on the CSU
18 monthly report, that they require them to send in.
19 So I'm not sure --
20 Q. Okay.
21 A. -- if it's on there.

Pg: 39 Ln: 7 - 21

Annotation:

39: 7 Q. Which ones would you expand?
8 A. I would expand PACT services to other
9 areas of the state, possibly smaller CSUs in some
10 of the rural areas or some areas of the state so
11 they don't have to drive so far. I mean, it's
12 available to everybody, it's just not maybe
13 necessarily convenient for everybody.
14 Q. And is having services that are
15 convenient important?
16 A. Yes.
17 Q. Why is that?
18 A. I think it's important that somebody
19 doesn't -- can get what they need from their
20 community. They don't have to go to another
21 community.

Pg: 50 Ln: 18 - Pg: 51 Ln: 5

Annotation:

50:18 Q. Okay. If the treatment teams at
19 Mississippi State Hospital had identified nine
20 people they -- that wanted to move, would the
21 treatment teams of Mississippi State Hospital
22 collectively decide which eight or would that
23 decision be made by The Arc or by Central Office
24 or by someone else?
25 A. There were many more referred than that.
51: 1 I don't know exactly how those eight got chose to
2 move first.
3 Q. Okay.
4 A. But there is more than nine that were
5 candidates or ready.

Pg: 57 Ln: 5 - 14

Annotation:

57: 5 Q. So all of the cash requests related to
6 PACT go to one person?
7 A. Yes.
8 Q. And all of the cash requests related to
9 crisis go to a different person?

TextMap Annotation Digest Report

Case Name: United States of America v. State of Mississippi, 3:16-cv-622

Transcript: [3/29/2018] 032918 Veronica Vaughn (Final)

Issue Filter: U.S. Rebuttal Designation (June)

Pg: 57 Ln: 5 - 14 continued...

Annotation:

57:10 A. Yes.
11 Q. Who is the PACT person?
12 A. Sherry Holloway.
13 Q. Who is the crisis person?
14 A. Brent Hurley.

Pg: 66 Ln: 18 - Pg: 67 Ln: 3

Annotation:

66:18 Q. Okay. Is there any office at the
19 Department of Mental Health that's responsible for
20 coor- -- any coordination of the list of
21 psychiatric medications that are prescribed by
22 CMHCs and the list of psychiatric medications that
23 are prescribed by -- at the State hospitals?
24 A. Not that I know of.
25 Q. Are you aware of whether or not
67: 1 differences in those lists have caused problems
2 for individuals?
3 A. I don't even know that there is a list.

Pg: 97 Ln: 11 - 19

Annotation:

97:11 o one of the job responsibilities you
12 had -- I believe you still have, but correct me if
13 I'm wrong -- is involvement in strategic planning,
14 correct?
15 A. Limited, but yes.
16 Q. What -- what -- what is your limited
17 involvement?
18 A. I'm responsible for providing
19 information, numbers, data twice a year.

Pg: 105 Ln: 12 - 16

Annotation:

105:12 Q. Okay. So have you been part of any
13 discussions in your time since 2011 about ways to
14 increase the amount of Medicaid funding that is
15 used for adult community services?
16 A. No.

Pg: 130 Ln: 7 - 9

Annotation:

130: 7 Q. Let's jump then to FY18 Strategic Plan,
8 which we will mark as Exhibit 48.
9 (Exhibit 48 marked for identification.)

TextMap Annotation Digest Report

Case Name: United States of America v. State of Mississippi, 3:16-cv-622

Transcript: [3/29/2018] 032918 Veronica Vaughn (Final)

Issue Filter: U.S. Rebuttal Designation (June)

Pg: 130 Ln: 21 - 25

Annotation:

130:21 Q. Okay. So how is the -- how are you
22 implementing strategy 1.3.1 to educate
23 stakeholders about the option of PACT?
24 A. I don't know how -- it's assigned to
25 Sherry and I don't know the exact answer to that.

**United States of America v. State of
Mississippi, 3:16-cv-622**

042618 Brent Hurley (Final)

4/26/2018

Annotation Digest - All Annotations

Issue Filter: U.S. Rebuttal Designation (June)

TextMap Annotation Digest Report

Case Name: United States of America v. State of Mississippi, 3:16-cv-622

Transcript: [4/26/2018] 042618 Brent Hurley (Final)

Issue Filter: U.S. Rebuttal Designation (June)

Pg: 39 Ln: 8 - Pg: 40 Ln: 3

Annotation:

39: 8 Q. Okay. Back to your résumé. The third
9 bullet point says that you, "Collect and analyze
10 data and review program records and service delivery
11 documentation to determine program effectiveness and
12 compliance with state mental health standards."
13 What are you referring to there?
14 A. Well, I collect data on the number of
15 referrals that go into the CSUs and the number and
16 types of calls that the mobile crisis response teams
17 submit to me. And then I also review the program
18 records when I would go on the site visits to the
19 mental health centers.
20 Q. And what is your purpose in collecting
21 and analyzing this data?
22 A. I don't know what my purpose is. I was
23 given the job to collect the data from Mr. Day when
24 he left. When someone asks for numbers of
25 admissions to the CSU for the year, if someone asks
40: 1 for the number of crisis calls the mobile crisis
2 response teams have gone on, I -- I provide them
3 with that information.

Pg: 41 Ln: 6 - 15

Annotation:

41: 6 Q. Okay. So this is a list of reports -- of
7 monthly reports it looks like that the providers
8 send to the bureau of adult services; is that
9 correct?
10 A. Yes, sir.
11 Q. Which of these reports are you
12 responsible for reviewing?
13 A. CMH purchase of service, CSU monthly
14 report, M-CeRT monthly report, and the AMAP monthly
15 report.

Pg: 50 Ln: 19 - 24

Annotation:

50:19 Q. How do you determine how much to award a
20 particular provider?
21 A. I don't determine.
22 Q. Who makes that determination?
23 A. I don't know who makes that
24 determination.

Pg: 98 Ln: 10 - Pg: 99 Ln: 6

Annotation:

98:10 Q. How did you get the information that you

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Case Name: United States of America v. State of Mississippi, 3:16-cv-622

Transcript: [4/26/2018] 042618 Brent Hurley (Final)

Issue Filter: U.S. Rebuttal Designation (June)

Pg: 98 Ln: 10 - Pg: 99 Ln: 6 continued...

Annotation:

98:11 supplied for these outputs?

12 A. I don't know that I actually supplied
13 this information. Any information that I supplied
14 to this report would have been drawn from the CDR
15 for mobile crisis response teams.

16 Q. Okay. Do you know what the column that's
17 the middle column, the one that says "On track," do
18 you know what that column is referring to?

19 A. That column is referring to whether or
20 not the plan -- the plan is -- has been achieved by
21 midyear or if it's on track to be achieved.

22 Q. And for something like the output number
23 of face-to-face visits, do you know who makes the
24 determination about whether it's on track or not?

25 A. I don't.

99: 1 Q. Did you make that decision?

2 A. I did not.

3 Q. Okay. Do you know what would cause, for
4 example, the output number of contact/calls to be on
5 or off track?

6 A. I -- I don't know specifically, no.

Pg: 112 Ln: 24 - Pg: 113 Ln: 1

Annotation:

112:24 Q. And you said that you do not supervise

25 PACT teams. Who does?

113: 1 A. Sherry Holloway.

Pg: 150 Ln: 13 - 23

Annotation:

150:13 Q. Okay. Did the reimbursement amounts
14 listed at page 5 of the Purchase of Services Grant
15 RFP --

16 A. Tell me the number again.

17 Q. 49973.

18 A. 73.

19 Q. Page 5.

20 A. Thank you. Okay.

21 Q. Are the reimbursement rates the same as
22 the Medicaid reimbursement rates?

23 A. They should be.

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Mississippi, 3:16-cv-622**

052318 Sherry Holloway - Final

5/23/2018

Annotation Digest - All Annotations

Issue Filter: U.S. Rebuttal Designation (June)

TextMap Annotation Digest Report**Case Name:** United States of America v. State of Mississippi, 3:16-cv-622**Transcript:** [5/23/2018] 052318 Sherry Holloway - Final**Issue Filter:** U.S. Rebuttal Designation (June)**Pg: 44 Ln: 13 - Pg: 45 Ln: 3****Annotation:**

44:13 Q. What's the data system that you input
 14 the data from the grants that goes to Jake
 15 Hutchins that we talked about earlier?
 16 A. It's a database that's on my computer --
 17 Q. Is there a name?
 18 A. -- that myself and another coworker
 19 built.
 20 Q. Is there a name for that database?
 21 A. It's just intensive community support
 22 and the PACT team and supportive employment. So I
 23 do three, and they are on my computer, they are
 24 not in the CDR.
 25 Q. Do you run any reports with this central
 45: 1 data repository?
 2 MR. MORISANI: Object to the form.
 3 A. I do not.

Pg: 120 Ln: 21 - Pg: 122 Ln: 20**Annotation:**

120:21 (Exhibit 148 marked for identification.)
 22 Q. (By Mr. Smiddie) Are you familiar with
 23 the document I just handed you?
 24 MR. MORISANI: If you need time to
 25 look through it too, you can.
 121: 1 Q. (By Mr. Smiddie) Take your time.
 2 A. (Examining.) Yes, I am familiar with
 3 it.
 4 Q. What is the document?
 5 A. It's the DMH FY strategic plan midyear
 6 progress report.
 7 Q. This is the DMH FY18 strategic plan
 8 midyear progress report. Is this the report that
 9 that e-mail we just talked about is referring to?
 10 A. Yes.
 11 Q. Okay. Turn to page 5. The bottom of
 12 page 5, there are is a row at the bottom that
 13 starts with "Outcome." The next column says,
 14 "Increase the availability of community support
 15 services for people with serious mental illness in
 16 order to implement the permanent supportive
 17 housing model." The next column says, "On track."
 18 The next column is blank. And the next column
 19 says, "211 people were housed through CHOICE and
 20 17 were discharged between July and December 2017.
 21 194 actively housed individuals as of December 13,
 22 2017. These are CHOICE numbers only. The CABHI,
 23 Cooperative Agreement to Benefit Homeless
 24 Individuals grant ended September 30, 2017."
 25 Were you the person responsible for

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Case Name: United States of America v. State of Mississippi, 3:16-cv-622

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Issue Filter: U.S. Rebuttal Designation (June)

Pg: 120 Ln: 21 - Pg: 122 Ln: 20 continued...

Annotation:

122: 1 gathering those numbers to go into this report?
2 A. Yes.
3 Q. On the next page about halfway down,
4 there is a row that starts with "Output." The
5 next column is, "Number of people, days in jail."
6 The next column says, "On track." The next column
7 says, "3." The next column says, "3 people went
8 to jail during July, December, 2017."
9 Were you responsible for gathering that
10 data for this report?
11 A. Yes.
12 Q. Is it correct that that number 3 is 3
13 people who went to jail while they were part of
14 the CHOICE program?
15 A. Yes.
16 Q. Do you make the determination that that
17 row is on track?
18 A. No, I do not.
19 Q. Do you know who does?
20 A. No, I do not.